PRATT&WHITNEY AIRCRAFT GROUP

Manufacturing Division

East Hartford, Connecticut 06108

November 19, 1981

U. S. Environmental Protection Agency Region I, Permits Branch P. O. Box 8748 Boston, Massachusetts 02114 FACILITY FROM + White I.B. NO. C 191672041

FILE LOC. A-17

OTHER ROMS #2507

Dear Sirs:

Pursuant to the Environmental Protection Agency's (EPA) regulations applicable to the Resource Conservation and Recovery Act (RCRA), 40 CFR 122.23, enclosed please find Consolidated Permit Application Forms 1 and 3 and supporting documents for the revision of Part A of the EPA Hazardous Waste Management Facility Interim Status application for Pratt & Whitney Aircraft's facility at 400 Main Street, East Hartford, Ct., (CTD 990672081). The revision is necessary due to the proposed installation of an additional process, i.e., a new incinerator for industrial wastes, some of which are hazardous. Justification for this change is included in the application revision as Addendum I. Required photographs were submitted with the original application.

Thank you for your courtesy and cooperation.

Very truly yours,

Robert J. Wyse Assistant Counsel

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IV. DESCRIPTION OF HAZARDO	US WASTI	ES		
	ot listed in	40 CFR, S	subpart D, enter the four-digit number(s)	or each fisted hazardous waste you will handle. If you from 40 CFR, Subpart C that describes the characteris-
	contaminar			entity of that waste that will be handled on an annual ntity of all the non-listed waste/s/ that will be handled
C. UNIT OF MEASURE — For each que codes are:	antity enter	ed in colu	mn B enter the unit of measure code, U	nits of messure which must be used and the appropriate
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account the appropriate density or sp D. PROCESSES	ecitic Greatty	OT THE WA	6t6.	
PROCESS CODES: For listed hezerdous waste: For to indicate how the waste will be:				le(s) from the list of process codes contained in Item III
For non-listed hazardous wastes:	For each of all the proc	characteris	tic or toxic contaminant entered in colu	nn A, select the code(s) from the list of process codes of all the non-listed hezardous wastes that possess
Note: Four spaces are provided	for entering		codes. If more are needed: (1) Enter the space provided on page 4, the line number	first three as described above; (2) Enter "000" in the and the additional code(s).
2. PROCESS DESCRIPTION: If a c	ode is not lis	ted for a p	rocess that will be used, describe the proc	ess in the space provided on the form,
NOTE: HAZARDOUS WASTES DESC				UMBER — Hazardous westes that can be described by
quantity of the waste and describi	ng all the pro	ocesses to	be used to treat, store, and/or dispose of t	plete columns B,C, and D by estimating the total annual he wasts.
"included with above" and make	no other enti	ries on that		o describe the waste, in column D(2) on that line enter dous waste.
per year of chrome shavings from leather are corrosive only and there will be an	er tanning an estimated 20	id finishing O pounds	poperation. In addition, the facility will to per year of each waste. The other waste	cility will treat and dispose of an estimated 900 pounds reat and dispose of three non-listed westes. Two wastes is corrosive and ignitable and there will be an estimated
100 pounds per year of that waste. Treet A. EPA	ment will be	C. UNIT		D. PROCESSES
HAZARD. Zó WASTENO JZ (enter code) QUANTITY OF		OF MEA- SURE (enter code)		2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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EPA Form 3510-3 (6-80) **CONTINUE ON PAGE 3** PAGE 2 OF 5

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included with above

NOTE: Photocopy this page before completing if you e more than 26 wastes to list. Form Approved OMB No. 158-S80004 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) 0 8 0 6 DUP W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE Z Ö 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) 36 29 27 1 Т TOl D 0 10 10 300,000 (RINSEWATER PRETREATMENT) 2 Р 0 3 INCLUDED WITH ABOVE 0 3 D 0 0 1,000,000 Т T 0 1 (RINSEWATER PRETREATMENT) 17,400 S 0 2 D 0 0 T 0 1 5 INCLUDED WITH ABOVE LINE 4 D 0 0 2 6 11 D 0 10 3 7 D 0 0 7 8 F 0 0 9 11 F 18 0 0 10 11 0 0 19 11 11 F 0 1 12 11 U 3 3 ll 13 11 U 3 1 4 14 11 8 8 U 1 15 11 U 2 0 16 600 \mathbf{T} 0 2 9 S 0 2 17 3 0 0 INCLUDED WITH ABOVE LINE 16 18 11 Ρ 0 9 8 19 11 Ρ 0 9 9 20 11 6 1 0 21 ** Ρ 2 IJ 22 0 0 0 18,000 Т S 0 2 23 3,000 F 0 0 S O 1 T O 1 3 24 F 0 0 2 INCLUDED WITH ABOVE LINE 23 U 0 4 4 7 26 U 0

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FCTD990672081 6					
V. FACILITY DRAWING					
All existing facilities must include in the space provided on	page 5 a sca	le drawing of the facility (see instruction	s for more d	etali).	
VI. PHOTOGRAPHS All existing facilities must include photographs (aero	ial or group	ad_level that clearly delineate all e	vietina etru	ctures: existing storag	ı P
treatment and disposal areas; and sites of future sto					
VII. FACILITY GEOGRAPHIC LOCATION					
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & seconds	i)	LONGITUD	€ (degrees, n	ninutes, & seconds)	<u> </u>
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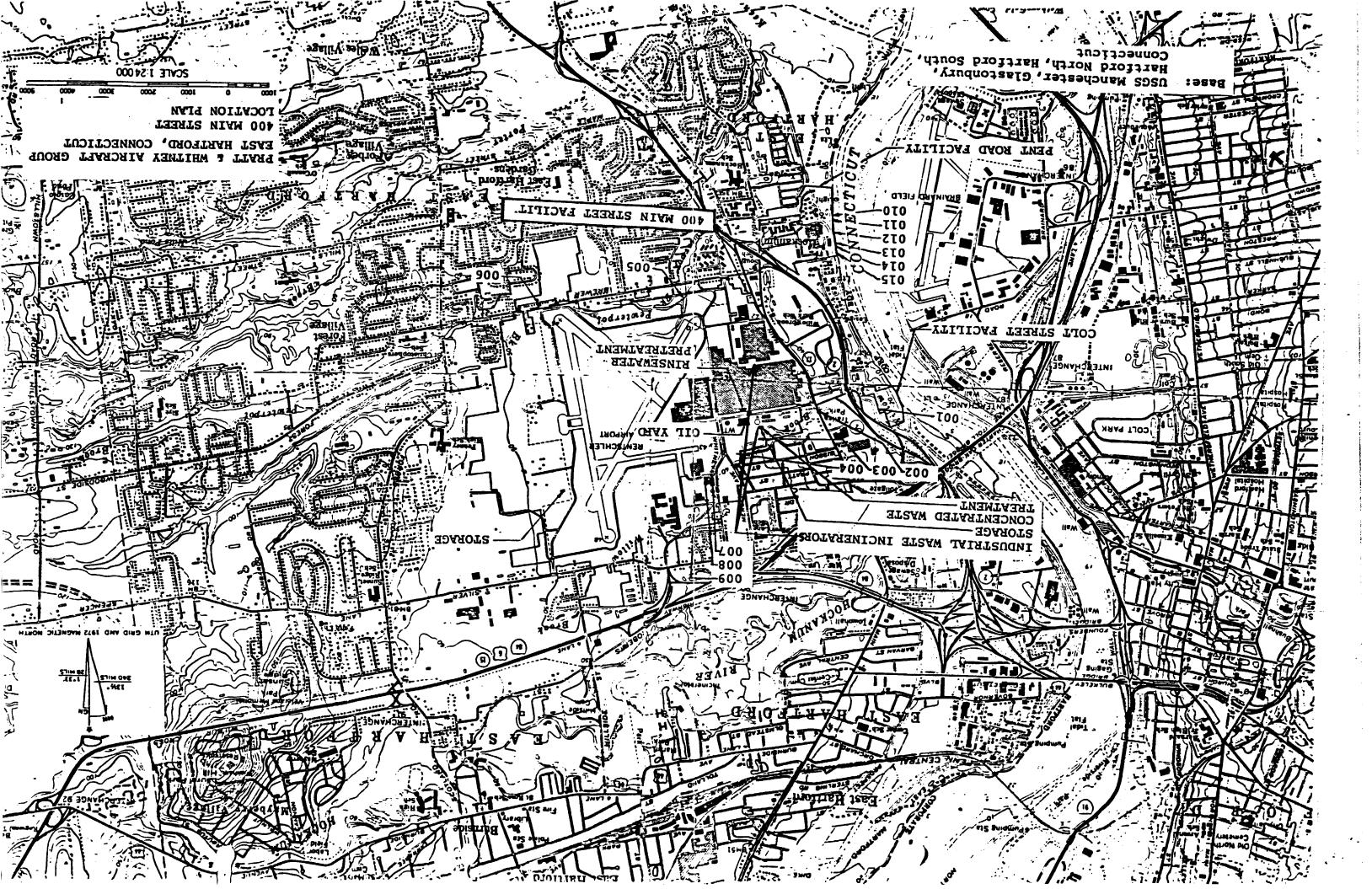
ATTACHMENT I, FORM I EPA I.D. NO. CTD99067081

X EXISTING ENVIRONMENTAL PERMITS (Cont'd.)

E. OTHER

P 053-0022	CT	STATE	EMISSIONS	PERMIT
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PRATT & WHITNEY AIRCRAFT GROUP EAST HARTFORD, CONNECTICUT



ADDENDUM I

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
HAZARDOUS WASTE MANAGEMENT FACILITY - PART A APPLICATION
REVISION

This serves as a justification for the revision of the Pratt & Whitney Aircraft Group, Part A, Resource Conservation and Recovery Act (RCRA), Hazardous Waste Management Facility (HWMF) application for the East Hartford Main Plant. This justification is required by Title 40 of the Code of Federal Regulations Part 122.23 c(2). The facility modification that necessitates the revision is reflected on Line 7 of Page 1 of RCRA Form 3. The additional incineration capacity of 0.30 tons per hour (600 pounds per hour) will result from the installation of a rotary kiln incinerator used to incinerate solid and semi-solid industrial wastes. Only a small portion (a maximum of 15%) of the waste to be incinerated is now considered to be a RCRA hazardous waste.

Because of the uncertain ability to continually dispose of its hazardous waste in an approved manner, and of the liability associated with hazardous waste mismanagement, the Pratt & Whitney Aircraft Group, Manufacturing Division has made it a policy to treat and dispose of its industrial waste in-house according to RCRA regulations. Originally the existing industrial waste incinerator, which was under construction on November 19, 1980, was to incinerate solid as well as liquid wastes. Upon further study it has been

determined that only liquid wastes will be incinerated in the existing incinerator. Therefore, an Industronics, Inc. HV-30 incinerator or equivalent with waste heat boiler and scrubber is proposed for the incineration of the solid and semi-solid wastes.

The appropriation for this incinerator system is \$250,000 and the total replacement cost of the East Hartford HWMF is estimated to be \$1.4 million.